

# Exhibit D

*to May 22, 2020 Letter from Ali Sadr*

**From:** [Lynch, Garrett](#)  
**To:** [Lake, Stephanie \(USANYS\)](#); [Kim, Jane \(USANYS\) 4](#); [Krouse, Michael \(USANYS\)](#)  
**Subject:** RE: Trial witness  
**Date:** Saturday, February 1, 2020 12:53:55 PM

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I did. They're happy to provide a witness (obviously happier to just provide a custodian). She believes (I think rightly) that they discovered the Stratus payment and filed the voluntary disclosure due to our investigation into the bank. That makes sense since they discovered the payment retroactively; it wasn't flagged in real time. So we can discuss how we would want to handle.

----- Original message -----

From: "Lake, Stephanie (USANYS)" <Stephanie.Lake@usdoj.gov>  
Date: 2/1/20 9:54 AM (GMT-05:00)  
To: "Lynch, Garrett" <LynchG@dny.nyc.gov>, "Kim, Jane (USANYS) 4" <Jane.Kim@usdoj.gov>, "Krouse, Michael (USANYS)" <Michael.Krouse@usdoj.gov>  
Subject: RE: Trial witness

Did you talk to her / how'd it go? Do we know what the basis for the disclosure was?

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**From:** Lynch, Garrett <LynchG@dny.nyc.gov>  
**Sent:** Friday, January 31, 2020 11:05 AM  
**To:** Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>  
**Subject:** FW: Trial witness

I'll reach out to her today. Let me know if anyone wants to join. The other asterisk with Commerz is that they filed a voluntary disclosure with OFAC regarding the payment – we should discuss whether it's worth having the Commerz witness go into that. It was signed by the head of AML/Anti-Fraud/Sanctions Compliance in NY – I'll see if she's still with the bank.

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**From:** Spiller, Christina (NY) [<mailto:Christina.Spiller@commerzbank.com>]  
**Sent:** Friday, January 31, 2020 10:41 AM  
**To:** Lynch, Garrett <[LynchG@dny.nyc.gov](mailto:LynchG@dny.nyc.gov)>  
**Cc:** Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>; Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>  
**Subject:** RE: Trial witness

Hello Garrett,

I just got your message and am happy to speak at your convenience. I'm free for most of today (except between 4.30 and 5.30 pm) and next week is pretty flexible as well.

Best,

Christina

Christina Spiller

Commerzbank AG

New York Branch

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**From:** Lynch, Garrett [<mailto:LynchG@dany.nyc.gov>]  
**Sent:** Friday, January 31, 2020 10:18 AM  
**To:** Spiller, Christina (NY)  
**Cc:** Lake, Stephanie (USANYS); Krouse, Michael (USANYS); Kim, Jane (USANYS) 4  
**Subject:** Trial witness

Hello Christina,

I left you a voicemail yesterday about a case I'm handling with the Southern District that is going to trial in early March. It involves a series of USD payments cleared through banks in New York in violation of U.S. sanctions against Iran in the 2011-2013 time period. In particular, one payment in April 2011 was processed through Commerzbank's Frankfurt and New York branches in the amount of \$29 million (the wire transfer record is attached). At trial, we likely will need a witness from Commerz to (a) authenticate the wire transfer record and possibly (b) testify about Commerz's payment screening at that time in NY. Can you let

us know a good time to discuss?

Thanks,

Garrett

Garrett A. Lynch

Deputy Bureau Chief

Major Economic Crimes Bureau

New York County District Attorney's Office

(212) 335-4335

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